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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KRISTOPHER THOMAS,
JUSTIN DAMONTE MITCHELL, and
NATASHA MICHELLE BAILEY,

Defendants.

CASE NO. 5:24-MJ-00006-CDB

**STIPULATION RE TREATMENT OF
PROTECTED INFORMATION**

WHEREAS, the discovery in this case contains a large amount of other people's personal identifying information, including personal identification numbers, dates of birth, financial account numbers, telephone numbers, and residential addresses ("Protected Information"); and

WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the unauthorized disclosure of Protected Information to anyone not a party to this case;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, the parties stipulate as follows:

1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the defendants' counsel in this case;

2. By signing this stipulation, defense counsel agree not to share any discovery that contains Protected Information with anyone other than defense counsel and defense counsel investigators and support staff. Defense counsel may permit the defendants to review unredacted discovery that contains Protected Information in the presence of defense counsel or defense counsel investigators and support staff. But defense counsel shall not allow the defendants to copy the Protected Information and may only provide the defendants with copies of discovery from which the Protected Information is redacted;

3. The discovery may be used only in connection with the litigation of this case. The discovery is now and will remain the property of the government. Defense counsel will return the discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

4. Defense counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement; and

5. In the event that the defendants substitute counsel, undersigned defense counsel agree to withhold discovery from the new defense counsel until the new defense counsel agree to be bound by this stipulation and resulting order.

IT IS SO STIPULATED.

DATED: March 5, 2024

/s/ Peter Jones

Peter Jones
Counsel for Kristopher Thomas

DATED: March 5, 2024

/s/ Monica Bermudez

Monica Bermudez
Counsel for Justin Damonte Mitchell

DATED: March 5, 2024

/s/ Alekxia Torres-Stallings

Alekxia Torres-Stallings
Counsel for Natasha Michelle Bailey

DATED: March 5, 2024

/s/ Karen A. Escobar

Joseph Barton
Assistant United States Attorney

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JUSTIN DAMONTE MITCHELL, and
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**ORDER RE TREATMENT OF PROTECTED
INFORMATION**

For good cause shown, the stipulation between counsel, dated March 5, 2024, in the above case, regarding the treatment of protected information contained in the discovery is approved.

IT IS SO ORDERED.

Dated: March 5, 2024


UNITED STATES MAGISTRATE JUDGE